

1
2 Stephen T. Graham
3 steve@grahamdefense.com
4 Law Office of Steve Graham
5 1312 North Monroe Street, Suite 140
6 Spokane, WA 99201
7 Tel: (509) 252.9167

8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF WASHINGTON**
10 **AT SPOKANE**

11 UNITED STATES OF AMERICA,

12 *Plaintiff,*

13 v.

14 MADDESYN DANIELLE GEORGE,

15 *Defendant.*

No. 2:20-CR-153-RMP

**DEFENDANT'S WITNESS
AND EXHIBIT LIST FOR
SENTENCING**

16 Comes now, MADDESYN D. GEORGE, by and through her attorney,
17 Stephen Graham, and hereby respectfully submits the following list of witnesses
18 and exhibits for her upcoming sentencing.
19

20 **WITNESSES**

- 21 1. **Jody George.** Ms. George is the mother of Maddesyn George. She will
22 speak to the concerns that she had when Maddesyn George started to
23 spend time with Mr. Graber. She will testify that Mr. Graber had
24 previously assaulted Maddesyn George's older sister. She will testify as to
25 the physical violence Maddesyn George sustained in her previous
26 relationships growing up. Jody George will testify that around the time of
27 the shooting, her daughter wasn't able to live with her because Jody

28 **DEFENDANT'S WITNESS AND
EXHIBIT LIST FOR SENTENCING**

George and her husband were in a high-risk group for Covid-19 and had to isolate themselves.

2. **Shannon Edwards.** Ms. Edwards will testify that she was with present the day Maddesyn George shot Kristopher Graber. She will testify that Maddeseyn George complained to her about being sexually assaulted by Kristopher Graber prior to Mr. Graber arriving on the scene that day. This was prior to Ms. George ever needing a justification for any use of force.

EXHIBITS

1. **Photograph of Maddesyn George.** This photograph, from July 2020, depicts Ms. George in her actual condition and size from the time of her arrest.
2. **Photograph of Handcuffs from Mr. Graber's bedroom.** This photograph, from July of 2020, depicts how Mr. Graber had steel handcuffs bolted to the wall beside his bed. Of the hundreds of photographs taken in this case this is the only this photo that depicts the handcuffs in Mr. Graber's room.
3. **Photograph of Maddesyn George's.** This photograph depicts bruises and injuries that Maddesyn George sustained as a teenager from the hands of her boyfriend at the time. Her mother Jody George took the photograph. This photo pertains to the abuse that Jody George describes to the probation officer. See PSIR Pg. 32 - ¶176. At sentencing, Jody George will explain that this abuse was a turning point in Maddesyn George's life, and that she thereafter spiraled into drug addiction and struggled with

1 post-traumatic stress disorder, all despite the efforts of her parents to try to
2 help her.

- 3 4. **Disciplinary Records of Sheriff's Deputy:** Maddesyn George did not
4 report the sexual assault to the police for a number of reasons. One of the
5 reasons was that she did not feel comfortable going to the local sheriff's
6 office because she had been the victim of unwanted attention from one of
7 the deputies in the past. The deputy had been unduly friendly toward her
8 in the past and he seemed to monitor her. Unbeknownst to Maddesyn
9 George, at the time, the deputy was being investigated for similar
10 behavior with at least one other local female known to the court system.
11 The records in this exhibit were obtained by Maddesyn George's lawyers
12 through the Washington Public Records Act.
- 13 5. **Audio Recording of Police Interview Describing Rape by Mr. Graber.**
14 This audio recording was done between Detective LaBounty and Officer
15 Marchand and Maddesyn George. She described having been sexually
16 assaulted by Mr. Graber. The interview takes place immediately after her
17 arrest. We feel that it is important for the court to listen to the recording
18 rather than to just read the transcript. This exhibit is already on file as
19 ECF 69.
- 20 6. **Transcript of Interview of Mary Graber.** This interview took place
21 between Detective LaBounty and Mary Graber, Kristopher Graber's
22 mother. She describes Maddesyn George in positive terms, including
23 being respectful and being helpful around the house.
- 24 7. **Police Report from Drug Arrest in Okanogan County.** This report is a
25 public record that shows that Maddesyn George's involvement in drug
26 offense was rather limited. The matter is discussed in PSIR Pg. 24 - ¶113.
27
28

DATED this 22nd day of September, 2021

s/ Stephen T. Graham
Stephen T. Graham, WSBA #25403
Attorney for the Defendant
Law Office of Steve Graham

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on September 22nd, 2021, I electronically filed the Defendant's Witness and Exhibit List with the Clerk of the Court using CM/ECF System which will send notification of such filing to the following: Alison Gregoire, Assistant United States Attorney, and Richard Barker, Assistant United States Attorney

s/ Stephen T. Graham
Stephen T. Graham, WSBA #25403
Attorney for the Defendant
Law Office of Steve Graham